

PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**Eli Lilly and Company
1650 Lilly Road
Shadeland, Indiana 47905**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 157-11949-00006	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Certification
Malfunction Report

SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary source, chemical manufacturing operation that produces pharmaceutical preparation and agricultural chemicals.

Responsible Official: Kenny McCleary
Source Address: 1650 Lilly Road, Shadeland, Indiana 47905
Mailing Address: P.O. Box 685, Lafayette, Indiana 47902
Phone Number: 765-477-4180
SIC Code: 2834 & 2879
County Location: Tippecanoe
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Existing Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) general process tank with a nominal capacity of 2,000 gallons, identified as TK 40-6, located in an existing building designated as T27 for a like-kind replacement of the old process tank, and capable of being controlled by the existing Regenerative Thermal Oxidizers (RTO) and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTO's.
- (b) One (1) general process tank with a nominal capacity of 2,000 gallons, identified as TK 28-3 and one (1) general process tank with a nominal capacity of 1,000 gallons, located in an existing building designated as T28 for a like-kind replacement of the old process tank, and capable of being controlled by the existing RTO and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTO's.
- (c) One (1) receiver tank, identified as Receiver Tank 611, with a nominal capacity of 500 gallons, located in an existing building designated as T31 for a like-kind replacement of the old receiver tank, and capable of being controlled by the existing RTO and/or condensers for VOC emissions.
- (d) One (1) still tank, identified as Still Tank 631, with a nominal capacity of 300 gallons, located in building T31 for a like-kind replacement of the old still tank, and capable of being controlled by the existing RTO and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTO's.

The point source emissions from the process vessels may vent directly to the RTO, or they may first vent to scrubbers, process control condensers, vacuum sources, or through other process vessels before going to the RTO. If venting the process vessels to the RTO would cause a safety concern, the process vessels may vent to an alternative pollution control device that complies with 326 IAC 8-5-3 and 326 IAC 2-2.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source has submitted a Part 70 permit application TV157-6879-00006 on October 10, 1996, pursuant to 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.9 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this approval until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

**C.10 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this approval;
 - (3) The Compliance Monitoring Requirements in Section D of this approval;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C-7 Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.12 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-7 Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) general process tank, identified as TK 40-6, located in building T27, with a nominal capacity of 2,000 gallons, for a like kind replacement of the existing tank, and capable of being controlled by the existing Recuperative Thermal Oxidizers, (RTO1 and RTO2), and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTO's.
- (a) One (1) general process tank, identified as TK 28-3, with a nominal capacity of 2,000 gallons, and one (1) general process tank, identified as TK 28-17, with a nominal capacity of 1,000 gallons, located in building T28, for a like kind replacement of the existing tanks, and capable of being controlled by the existing RTOs and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTO's.
- (b) One (1) receiver tank, identified as Receiver Tank 611, with a nominal capacity of 500 gallons, located in an existing building designated as T31, for a like kind replacement of the existing tank, and capable of being controlled by the existing RTOs and/or condensers for VOC emissions.
- (c) One (1) still tank, identified as Still Tank 631, with a nominal capacity of 300 gallons, located in building T31, for a like kind replacement of the existing tank, and capable of being controlled by the existing RTOs and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTOs.

The point source emissions from the process vessel may vent directly to RTO1 or RTO2, or they may first vent to scrubbers, process control condensers, vacuum sources, or through other process vessels before going to RTO1 or RTO2. If venting the process vessel to RTO1 or RTO2 would cause a safety concern, the process vessel may vent to an alternative pollution control device. Also, in the event that RTO1 or RTO2 is unavailable, Lilly may continue manufacturing operations in the process vessel using other existing pollution control equipment that complies with 326 IAC 8-5-3 and 326 IAC 2-2. The carbon monoxide emissions from the replacement tank will be voluntarily vented to RTO1 or RTO2. The sulfur dioxide and nitrogen oxide emissions from the replacement tank will be voluntarily controlled by scrubbers.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Miscellaneous Operation: Synthesized Pharmaceutical Manufacturing [326 IAC 8-5-3]

- (a) Pursuant to 326 IAC 8-5-3 the outlet gas temperature shall not exceed the following when using condensers to control the VOC emissions from tanks TK 40-6, TK 28-3, TK 28-17, Receiver Tank 611 and Still Tank 631:
 - (1) minus twenty-five degrees Celsius (-25EC) when condensing VOC of vapor pressure greater than forty (40) kilo Pascals (five and eight-tenths (5.8) pounds per square inch);
 - (2) minus fifteen degrees Celsius (-15EC) when condensing VOC of vapor pressure greater than twenty (20) kilo Pascals (two and nine-tenths (2.9) pounds per square inch);

- (3) zero degrees Celsius (0EC) when condensing VOC of vapor pressure greater than ten (10) kiloPascals (one and five-tenths (1.5) pounds per square inch);
 - (4) ten degrees Celsius (10EC) when condensing VOC of vapor pressure greater than seven (7) kiloPascals (one (1) pound per square inch); or
 - (5) twenty-five degrees Celsius (25EC) when condensing VOC of vapor pressure greater than three and five-tenths (3.5) kilo Pascals (five-tenths (0.5) pound per square inch).
 - (6) The vapor pressures listed above shall be measured at twenty degrees Celsius (20EC).
 - (7) If the equivalent control identified as RTO1 or RTO2 is used, the VOC emissions must be reduced by at least as much as they would be by using a surface condenser which meets the requirements of conditions (1) through (6) as applicable.
- (b) When VOC emissions from TK40-6, TK 28-3, TK 28-17, Receiver Tank 611 and Still Tank 631 are controlled by the Regenerative Thermal Oxidizer system identified as RTO1 or RTO2, the following shall apply:
- (1) The RTOs operating temperature shall be maintained at 1600°F, or the temperature determined during the most recent stack tests, to maintain at least 90% destruction of the VOCs.

Compliance Determination Requirements

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-3(b)(5)(6)]

- (a) Pursuant to 326 IAC 8-5-3(b)(5), the Permittee shall install covers on all in process tanks that contain volatile organic compound. These covers shall be kept closed, unless production sampling, maintenance, or inspection procedures require operator access.
- (b) Pursuant to 326 IAC 8-5-3(b)(6), the Permittee shall repair all visible leaks from which a liquid, containing VOC, can be observed running or dripping. The repair shall be completed the first time the equipment is off line for a period of time long enough to complete the repair.

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. The testing required for this facility will be deferred and shall follow the schedule in the Title V Permit, to determine compliance with 326 IAC 8-5-3. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, limits specified in Conditions D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Monitoring for VOC Emissions

- (a) The VOC emissions from the proposed replacement process vessels, TK 40-6, TK 28-3, TK 28-17, Receiver Tank 611 and Still Tank 631, shall be in compliance with 326 IAC 8-5-3 provided that:

- (1) the Regenerative Thermal Oxidizers (RTO1 or RTO2) or Condensers (when Lilly elects to control the VOC by condensers) shall operate at all times the equipment being controlled are in operation;
- (2) when the VOC emissions from the proposed process tanks are controlled by RTO1 or RTO2, the RTO's operating temperature shall be maintained at 1600 °F, or the temperature determined during the most recent stack tests, to maintain at least 90% destruction of the volatile organic compounds. The operating temperature of the RTOs shall be recorded and monitored continuously;
- (3) when the VOC emissions from the proposed process tank are controlled by the condensers the outlet gas temperature shall be equal to or less than that specified by 326 IAC 8-5-3, see condition D.1.1;
- (4) the Permittee records the time during which the RTOs or condensers, serving the proposed process tanks were not operating;
- (5) the Permittee records the reason the RTOs or condensers were not operated;
- (6) the Permittee records the corrective actions taken to bring the RTOs or condensers to normal operation; and
- (7) the Permittee records the number of hours the proposed process tanks were vented to points other than the RTOs or condensers complying with 326 IAC 8-5-3

D.1.5 40 CFR Part 63, Subpart H and I (National Emissions Standard for Hazardous Air Pollutants)

That the owner or operator shall implement the Leak Detection and Repair (LDAR) Program proposed by Eli Lilly and most recently approved by the Office of Air Management, to reduce fugitive VOC emissions from processes that use methylene chloride. If it is not feasible to either pressure test a group of fugitive sources or monitor a specific compound, then a written justification will be required for each source or compound exempted from testing. Any necessary adjustments to the procedures shall be submitted to the Office of Air Management for approval prior to implementation.

D.1.6 40 CFR Part 63, Subpart GGG (National Emissions Standard for Pharmaceutical Production)

The proposed replacement tank, TK 40-6, is subject to National Emissions Standard for Hazardous Air Pollutants 40 CFR Part 63, Subpart GGG (National Emissions Standard for Pharmaceutical Production), and shall be in compliance with this NESHAP when it is promulgated by the year 2001.

D.1.7 Malfunction Condition [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM. Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment subject to the requirements of 326 IAC 1-6 shall constitute a violation of 326 IAC 1-6 and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document the compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below.
 - (1) Weekly records of the operating temperature of the Regenerative Thermal Oxidizers during normal operation when TK 40-6 is emitting VOC.
 - (2) The malfunction reports of the RTOs, condensers and scrubbers
 - (3) The number of hours the proposed process tanks including existing facilities were vented to points other than the RTOs or the condenser
- (b) An owner or operator of the facility covered by this permit, when using methylene chloride, shall comply with the record keeping requirements provided in Leak Detection and Repair (LDAR) Program proposed by Eli Lilly and most recently approved by the Office of Air Management.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) Each owner or operator of a source shall submit the reports as required per the Leak Detection and Repair (LDAR) Program proposed by Eli Lilly and most recently approved by the Office of Air Management.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Eli Lilly and Company
Source Address: 1650 Lilly Road, Shadeland, IN 47905
Mailing Address: 1650 Lilly Road, Shadeland, IN 47905
Source Modification No.: 157-11949-00006

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Minor Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Eli Lilly and Company
Source Location:	1650 Lilly Road, Shadeland, Indiana 47905
County:	Tippecanoe
SIC Code:	2834 and 2879
Operation Permit No.:	T157-6879-00006
Operation Permit Application:	October 10, 1996
Minor Source Modification No.:	157-11949-00006
Permit Reviewer:	Linda Quigley/EVP

The Office of Air Management (OAM) has reviewed a minor source modification application from Eli Lilly and Company relating to the like-kind replacement and operation of:

- (a) One (1) general process tank with a nominal capacity of 2,000 gallons, identified as TK 40-6, located in an existing building designated as T27, and capable of being controlled by the existing Regenerative Thermal Oxidizers (RTO1 or RTO2) and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTOs.
- (b) One (1) general process tank with a nominal capacity of 2,000 gallons, identified as TK 28-3 and one (1) general process tank with a nominal capacity of 1,000 gallons, identified as TK 28-17, located in an existing building designated as T28, and capable of being controlled by the existing RTOs and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTOs.
- (c) One (1) receiver tank, identified as Receiver Tank 611, with a nominal capacity of 500 gallons, located in an existing building designated as T31, and capable of being controlled by the existing RTOs and/or condensers for VOC emissions.
- (d) One (1) still tank, identified as Still Tank 631, with a nominal capacity of 300 gallons, located in building T31, and capable of being controlled by the existing RTOs and/or condensers for VOC emissions. SO₂ and NO_x emissions will be voluntarily controlled by scrubbers. CO emissions will be voluntarily vented to the RTOs.

History

On February 29, 2000, Eli Lilly and Company submitted an application to the OAM requesting to replace three (3) general processing tanks, one (1) receiver tank, and one (1) still tank. Eli Lilly and Company submitted a Part 70 permit on October 10, 1996.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
RTO 1	General Tanks TK 40-6, TK 28-3, TK 28-17, Receiver Tank 611, Still Tank 631	125	9	98,000	170
or RTO 2	General Tanks TK 40-6, TK 28-3, TK 28-17, Receiver Tank 611, Still Tank 631	125	9	105,000	170

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 29, 2000.

Justification for Modification

The Title V permit is being modified through a Minor Source Modification. Pursuant to 326 IAC 2-7-10.5(d)(8), for a modification to an existing source which will replace pieces of equipment in an existing process with like-kind equipment that has the potential to emit less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of VOC with control equipment to comply with 326 IAC 8.

County Attainment Status

The source is located in Tippecanoe County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Tippecanoe County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	438.17
PM-10	438.17
SO ₂	970.34
VOC	188.35
CO	196.05
NO _x	418.96

- (b) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (c) These emissions are based upon the 1998 Annual Air Emission Inventory and Emissions Statement.

Potential to Emit After Controls for the Modification

There will be no change in potential to emit due to the modification.

Federal Rule Applicability

- (a) The replacement tanks TK 40-6, TK 28-3, TK 28-17, Receiver Tank 611 and Still Tank 631 are not subject to any New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60).
- (b) The replacement tanks TK 40-6, TK 28-3, TK 28-17, Receiver Tank 611, and Still Tank 631 are subject to the National Emissions Standard for Pharmaceutical Production, 40 CFR Part 63, Subpart GGG and shall be in compliance with this NESHAP by the year 2001.
- (c) The replacement tanks TK 40-6, TK 28-3, TK 28-17, Receiver Tank 611, and Still Tank 631 are subject to the National Emissions Standard for Hazardous Air Pollutants 40 CFR 63.190(b)(5) Subparts H and I when Methylene Chloride is used for pharmaceutical synthesis operations. Compliance will be achieved by the implementation of the Lilly Leak Detection and Repair (LDAR) Program. If it is not feasible to either pressure test a group of fugitive sources or monitor a specific compound, then a written justification will be required for each source or compound exempted from testing. Any necessary adjustments to the procedures shall be submitted to the Office of Air Management for approval prior to implementation.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration - PSD)

Pursuant to 326 IAC 2-2-1(o)(2)(A) the like-kind replacement tanks which Eli Lilly propose qualify as routine maintenance, repair, and replacement for the following reasons:

- (a) Nature and extent - Replacement of a pharmaceutical process tank with a like-kind tank does not involve the replacement of numerous major components of the production site;
- (b) Purpose - Tank replacements do not significantly enhance the present efficiency and capacity of the plant. Tank replacement projects do not substantially extend the useful economic life of a pharmaceutical plant;
- (c) Frequency - Tank replacements within a production building occur relatively frequently instead of only once or twice within a building's useful life;
- (d) Cost - A tank replacement is not unusually costly, given the cost of manufacturing equipment. The cost of a new replacement tank is only a small fraction of the cost for an entirely new production building.

Therefore the proposed like-kind replacement tanks are not considered a major PSD modification.

326 IAC 2-6 (Emission Reporting)

These facilities are subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC, NO_x, CO, PM, or SO₂. Pursuant to this rule, the owner/operator of the facilities must annually submit an emission statement. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 7 (Sulfur Dioxide Emission Limitations):

This rule does not apply because the tanks are not fuel combustion facilities.

326 IAC 8-5-3 (Synthesized Pharmaceutical Manufacturing Operations)

General process tanks TK 40-6, TK 28-3, and TK 28-17 are subject to 326 IAC 8-5-3 (b)(1), (5), and (6) because it has potential uncontrolled VOC emissions greater than 15 lb/day and are used in pharmaceutical manufacturing by chemical synthesis. Pursuant to 326 IAC 8-5-3 (b)(1) the outlet gas temperature when using condensers to control the VOC emissions from the general process tanks shall not exceed the following:

- (1) If surface condensers are used, the condenser outlet gas temperature must not exceed:

- (A) minus twenty-five degrees Celsius (-25°C) when condensing VOC of vapor pressure greater than forty (40) kilo Pascals (five and eight-tenths (5.8) pounds per square inch);
 - (B) minus fifteen degrees Celsius (-15°C) when condensing VOC of vapor pressure greater than twenty (20) kilo Pascals (two and nine-tenths (2.9) pounds per square inch);
 - (C) zero degrees Celsius (0°C) when condensing VOC of vapor pressure greater than ten (10) kilo Pascals (one and five-tenths (1.5) pounds per square inch);
 - (D) ten degrees Celsius (10°C) when condensing VOC of vapor pressure greater than seven (7) kilo Pascals (one (1) pound per square inch); or
 - (E) twenty-five degrees Celsius (25°C) when condensing VOC of vapor pressure greater than three and five-tenths (3.5) kilo Pascals (five-tenths (0.5) pound per square inch).
- (2) The vapor pressures listed above shall be measured at twenty degrees Celsius (20°C).
- (3) If the equivalent control identified as RTO1 or RTO2 is used, the VOC emissions must be reduced by at least as much as they would be by using a surface condenser which meets the requirements of clause (A).

Pursuant to 326 IAC 8-5-3(b)(5), the general process tanks must have covers installed. These covers shall be kept closed unless production sampling, maintenance, or inspection procedures require operator access.

Pursuant to 326 IAC 8-5-3(b)(6), all visible leaks from which a liquid, containing VOC, can be observed running or dripping shall be repaired. The repair shall be completed the first time the equipment is off line for a period of time long enough to complete the repair.

326 IAC 8-1-6 (BACT):

The requirement to reduce VOC emissions using Best Available Control Technology (BACT) does not apply to these facilities because the facilities are subject to the requirements of 326 IAC 8-5-3.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The replacement general process tanks TK 40-6, TK 28-3, TK 28-7, Receiver Tank 611 and Still Tank 631 have applicable compliance monitoring conditions as specified below:
 - (a) The owner or operator shall implement the Leak Detection and Repair (LDAR) Program proposed by Eli Lilly, most recently approved by the Office of Air Management, to reduce fugitive VOC emissions from processes that use methylene chloride. If it is not feasible to either pressure test a group of fugitive sources or monitor a specific compound, then a written justification will be required for each source or compound exempted from testing. Any necessary adjustments to the procedures shall be submitted to the Office of Air Management for approval prior to implementation.
 - (b) The replacement process tanks, General TK 40-6, TK 28-3, TK 28-17, Receiver Tank 611 and Still Tank 631 are subject to 40 CFR Part 63, Subpart GGG (National Emissions Standard for Pharmaceutical Production) and shall be in compliance with this NESHAP by the year 2001.
 - (c) The Permittee shall record the operating temperature of the Regenerative Thermal Oxidizers (RTO's) used in conjunction with the tanks at least once per week when the tanks are in operation and venting to the atmosphere. The operating temperature for the RTO's shall be maintained at 1600 °F, or the temperature determined during the most recent stack tests.
 - (d) When the VOC emissions from the proposed process tanks are controlled by the condensers, the outlet gas temperature shall be equal to or less than that specified by 326 IAC 8-5-3.
 - (e) The RTO's or Condensers shall operate at all times the equipment being controlled are in operation

These monitoring conditions are necessary because the Regenerative Thermal Oxidizers and the condensers must operate properly to ensure compliance with 326 IAC 2-7 (Part 70), and 326 IAC 8-5-3 (Synthesized Pharmaceutical Manufacturing Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Minor Source Modification to a Part 70 Permit No. 157-11949-00006.